

# BRACEWELL

June 27, 2019

**VIA ECF**

Honorable Lewis A. Kaplan  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: United States v. Abdel-Wadood, 19 Cr. 233

Dear Judge Kaplan:

I write to seek a modification of Mustafa Abdel-Wadood's bail conditions. The government (AUSA Brendan Quigley) consents to this modification.

Mr. Abdel-Wadood is currently restricted to an apartment building in midtown and wears an electronic monitor to ensure compliance with that restriction. There are also four co-signors on a \$10 million bond secured by two properties. Tomorrow morning, Mr. Abdel-Wadood is scheduled to plead guilty before Magistrate Judge Gorenstein. The proposed modification would allow Mr. Abdel-Wadood to travel in Manhattan between 7:00 a.m. and midnight; he would continue to be electronically monitored and the bond conditions would remain in place. Mr. Abdel-Wadood's family is now in New York City and living with him for the summer. His wife and son would surrender their passports during their stay.

If this proposal is acceptable to the Court, we would discuss bail further with the government before the family returns to Dubai in late August for the beginning of the school year. The intention would be to propose, on consent, a new bail package that would permit the family's passports to be returned but give the Court continued confidence that Mr. Abdel-Wadood is not a flight risk.

**Paul Shechtman**  
Partner

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June 27, 2019

Page 2

As noted, the government consents to this proposed modification; Pretrial Services takes no position and would adjust the monitoring conditions accordingly if this request is granted.

Respectfully submitted,

/s/ Paul Shechtman

Paul Shechtman

PS/wr

cc: AUSA Brendan Quigley  
Pretrial Services Officer Joshua Rothman